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Federal Elections Commission Arman Tarzi Reports Analysis Division 999 E Street, NW Washington, DC 20463

Dear Mr. Tarzi,

This letter is in response to the Request for Additional Information sent to America Votes Action Fund on May 31, 2013.

In the first item on the RFAI, you ask about the itemization of reimbursements to staff. On June 27, 2013, after the date of your Request for Additional Information, the Commission adopted an Interpretive Rule on Reporting Ultimate Payees of Political Committee Disbursements. This rule requires information beyond that required by the recordkeeping requirements of 11 C.F.R. ? 102.9; therefore, America Votes Action Fund will be complying with the Commission?s new guidance prospectively.

In response to the second item in your request for additional information, America Votes Action Fund has determined that these expenses should have been reported as memo entries on Schedule E, Line 24 prior to the election. We will amend our report to reflect this error.

Thank you for your help with this matter. Please feel free to contact me at (202) 762-7240 with any questions or concerns you may have.

Sincerely,

Joan Fitz-Gerald Treasurer America Votes Action Fund